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February 27, 2024

**VIA ECF**

Hon. Arun Subramanian  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007  
(212) 805-0238

**Re: Doe v. Gov't of the U.S. Virgin Islands, et al., No. 1:23-cv-10301-AS**

Dear Judge Subramanian,

We represent Defendant Delegate Stacey Plaskett in this action. We write to request an extension of time to move to dismiss the complaint. Plaintiffs served Ms. Plaskett on February 15, 2024 at her home in Washington D.C. Rule 12 requires that Ms. Plaskett answer or move to dismiss the complaint by March 7, 2024 (21 days). Plaintiffs have consented only to a short extension of slightly more than one week to March 15, 2024. We respectfully request a three-week extension for our time to respond to March 28, 2024 to answer or file a motion in response.

Plaintiffs' complaint is over 40 pages long. We anticipate filing a substantial motion to dismiss, addressed to some or all of the counts that will require time to research and write. Further, Ms. Plaskett is an elected official in the United States House of Representatives and has a very demanding work and travel schedule, which impacts her availability and our ability to meet and confer with her. There is only one other pending motion to dismiss by Defendant John DeJongh, to which Plaintiffs' response due April 2, 2024. Plaintiffs will thus suffer no prejudice by having to file its response to this DeJongh motion to dismiss a few days after Ms. Plaskett's answer or motion would be due.

This is Ms. Plaskett's first request for any extension. This case currently has two relevant deadlines: (1) Plaintiffs' motion to respond to the motion to dismiss by Defendant John DeJongh on April 2, 2024, and (2) the first case management conference on May 3, 2024. In accordance

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with the Court's individual rules of practice, Eric R. Breslin (the undersigned) is hereby designated as lead trial counsel.

We respectfully request this modest extension of time to move to dismiss the complaint from March 7, 2024 to March 28, 2024. We thank the Court for its consideration of this request

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

cc: All Counsel of Record (Via ECF)